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Attorneys for Plaintiff JAMES WASHBURN

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

JAMES WASHBURN,

Plaintiff,

vs.

SAN FRANCISCO POLICE OFFICERS
ALEX FAGAN, JR. (#1942) AND WALTER
CONTRERAS (#1082), THE CITY AND
COUNTY OF SAN FRANCISCO, et. al.,

Defendants.

KEVIN ROY JORDAN,

Plaintiff,

vs.

ALEX FAGAN, JR., an individual San
Francisco Police Officer (Star #1942), and
JASON KRISTAL, an individual San Francisco
Police Officer (Star #4217), the CITY AND
COUNTY OF SAN FRANCISCO, a municipal
entity, and DOES 1 through 100, inclusive.

Defendants.

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Case No: C 03 869 MJJ (EDL)
C 03 1194 MJJ (EDL)

NOTICE OF MOTION AND MOTION TO
COMPEL DISCOVERY

[F.R.Civ. 37(a)]

Date: August 3, 2004
Time: 9:00 a.m.
Court: Courtroom E
Hon. Elizabeth LaPorte

TO DEFENDANTS AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on August 3, at 9 a.m, in Courtroom E of the United States District Court, 450 Golden Gate Avenue, San Francisco, California, before the Honorable Magistrate Elizabeth D. LaPorte, plaintiffs James Washburn and Kevin Jordan, through counsel, will move and hereby do move for an order to compel discovery which was propounded in joint and individual discovery requests requesting documents and interrogatory responses, pursuant to Federal Rules of Civil Procedure 26 and 34.

PLEASE TAKE FURTHER NOTICE that this motion is based upon the concurrently filed memorandum of points and authorities, declaration of counsel with exhibits, the records and files in the above-entitled actions, and whatever documentary evidence and oral argument that may be adduced upon the hearing of this matter.

Dated: June 29, 2004

Respectfully submitted,

DENNIS CUNNINGHAM
BEN ROSENFELD
HARRIET ROSS
JAI M. GOHEL

/s/
By: _____
JAI M. GOHEL
Attorneys for Plaintiffs